

Cote, J  
Pant, I

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INEOS AMERICAS LLC and  
INEOS OXIDE LIMITED

Plaintiffs,

v.

DOW CHEMICAL COMPANY

Defendant.

20 CV 1385

20 Civ. \_\_\_\_\_

[PROPOSED] ORDER SEALING  
PORTIONS OF COMPLAINT AND  
CERTAIN EXHIBITS TO COMPLAINT

Upon the oral application of Plaintiffs in the above captioned action and the annexed declaration of Rachel G. Skaistis, executed on February 14, 2020 ("Skaistis Declaration"), and good and sufficient reason appearing therein for the grant of said application, it is hereby:

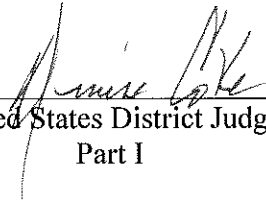
ORDERED that, upon payment of the requisite filing fee, the Plaintiffs shall be permitted to file under seal (a) the complete, un-redacted Complaint in this action and Exhibits 1 and 2 to the Complaint and (b) Exhibits A, C and D to the Skaistis Declaration, ~~with access~~ <sup>DEG</sup> ~~limited to the parties, their attorneys and authorized Court personnel,~~ without prejudice to a later application, on notice, at any time before the judge to whom this action is assigned to unseal these materials; and it is further

ORDERED that, after filing under seal the un-redacted Complaint and Exhibits 1 and 2 to the Complaint, as set forth in the preceding paragraphs, the Plaintiffs are directed to publicly file a copy of the Complaint as redacted in the form attached as Exhibit B to the Skaistis Declaration; and it is further

ORDERED that, the Plaintiffs shall proceed forthwith to serve on Defendant a copy of this Order and the Skaistis Declaration, together with the summons, un-redacted Complaint, and any other materials required by the Federal Rules of Civil Procedure and applicable law.

Dated: February 14, 2020

New York, New York

  
\_\_\_\_\_  
United States District Judge  
Part I

